

13 September 2018

Dear Sirs

Former BCU City North Campus Franchise Street Perry Barr Birmingham B42 2SU Full 2018/06313/PA

Birmingham Friends of the Earth welcomes the opportunity to comment on the proposals for the redevelopment of the above site. We note that the deadline is 20th September 2018 and would like to point out that this is an interim response. We intend to submit a more detailed response in due course.

Introduction

We are an environmental campaigning and educational organisation based in Birmingham, engaged with advancing the principles of environmental sustainability and positive environmental change with an emphasis on issues which affect Birmingham.

We would like to point out that the proposed redevelopment is a golden opportunity to stage the 'greenest' Commonwealth Games ever and pass on an enduring legacy of a sustainable high quality residential development with affordable energy-efficient housing for Birmingham residents. Maximum accessibility by walking cycling and public transport should be at the heart of the development with minimal reliance on access by private car.

Overall we would like to see the development have a low carbon footprint and be zero/net zero energy in terms of its overall environmental impact. It should also contribute towards the city councils targets on improving local and city-wide air quality.

1. Energy Strategy

The housing development and other buildings should be designed for a zero carbon / net zero energy and be affordable to run and maintain. The thermal insulation of the homes should be to a high standard and if possible designed and constructed to the Passivhaus standard or similar. This standard has been used in a variety of residential and non residential buildings both in the UK and in numerous other countries.

We are disappointed to note that there are no plans to include on-site renewables in the proposed development. While we appreciate that wind turbines are not suitable for an urban environment such as this, we do not see any reason for not including solar photo voltaic panels (PV). The Energy Strategy states that it is not possible to accommodate solar panels on the roofs of the proposed buildings as the space will be used for green roof systems. However, we do not see why the two measures cannot be used together. Indeed Bauder Limited, a leading supplier of green roof systems, specialises in just such a system.

A local district heating system should be considered as an alternative to the proposed gas central heating system for each plot. Energy sources for heating other than gas from the grid should be considered to avoid reliance on fossil fuels and reduce emissions of carbon dioxide and other gases. It has been estimated that in London, gas central heating boilers account for around 16% of nitrogen

oxides. Electricity either generated on site or derived from the grid may be considered as a greener alternative energy source than gas given that electricity generation can be switched to alternative non-polluting fuel sources such as wind and solar.

A district heating system could be powered by air source or ground source heat pumps, which can run in reverse in Summer to provide cooling.

We would hope that the energy performance of the proposed residential housing will be assessed by using tools such as the Sustainable Housing Action Partnership new build healthy homes performance standard and the Birmingham Developers Toolkit.

2. Transport

As a starting point, car dependency both for the duration of the Commonwealth Games and longer term, post games, should be minimal while attractive walking, cycling and public transport alternatives should be maximised. The strategy should include reallocation of road space towards public transport, cycling and pedestrian use. Redesign of highways adjacent to and within the proposed development should prevent traffic from speeding. Furthermore, pedestrian guard rails which induce speeding and create a threatening environment for all road users should be avoided wherever possible.

The current layout of public highways adjacent to, in the vicinity of, and passing through the proposed development site is unpleasant for pedestrian and cyclist movements. This is particularly the case with the A34 Walsall Road, where a complex junction with a concrete flyover acts as a barrier between the former BCU Campus, Perry Barr Station and the main One Stop Shopping Centre. Similarly, just to the south, the Birchfield Underpass and the Walsall Road/A4040 junction with its pedestrian subways is extremely unpleasant and feels threatening and unsafe even in broad daylight. We note the aspiration to improve the public realm in these areas which may include removal of the flyover and infilling the underpass. We welcome this approach to make the area more 'human' friendly. However a flat signalled junction which is badly designed could be just as bad as the current layout of flyovers or underpasses especially if there are high speed entry and exits to large traffic islands and echelons of pedestrian guard rails. We look forward to seeing the details of this proposal before making a more complete comment.

Perry Barr railway station although not within the development area, will be an important gateway for the Commonwealth Games. In its current form it will not cope with the volume of visitors and is extremely unattractive. We note that intention to extend the platforms eastwards from the A34 overbridge and to create a new entrance directly from the proposed athletes village and subsequent residential development. We believe these measures are essential, both for the games and in the longer term for the community as a whole.

3. Air Quality

Reducing car dependency and providing safe and attractive walking and cycling facilities and zero emission or very low emission buses and bus priority measures will tie in with the council's aims of proposals for the Clean Air Zone and its Air Quality Strategy which will be published later in Autumn 2018.

Green infrastructure such as street trees may be used as mitigation measures for air pollution.

The impact on local air quality from construction traffic, construction plant and from the construction activity itself should also be taken into account.

Emissions from domestic gas central heating boilers have been estimated to contribute to 16% of NO_x in London (source London Atmospheric Emissions Inventory). Alternative zero emission fuel sources to gas from the national grid for space and water heating should be identified.

4. Biodiversity and habitats

We feel that the proposed development provides an ideal opportunity for a green legacy for the natural environment, playing a key role in improving current natural habitats and the development of new ones.

We believe enhancements to biodiversity should be made in accordance with Birmingham City Council's Nature Conservation Strategy. Policy 14 of the strategy states that developments should take into account the impacts on nature and ensure any negative impact is minimal. There are a number of ambitions contained within the Development Guidelines, including minimising impermeable surfaces by using 'grasscrete' or equivalent for vehicle surfaces. This would allow sustainable drainage of the area, reducing the risk of flooding. Consideration should also be given to creating a strategic open spaces network such as creating a wildlife corridors between the proposed development and surrounding playing fields and the Tame Valley Canal.

Wildlife-friendly measures could be included in the proposed buildings such as installing 'Swift Brick' nest boxes under the eaves of some proposed buildings.

We are pleased that the proposed plans include green roofs which will support sustainable drainage, air quality improvement, and reducing the urban heat island effect. However we would like to highlight the importance of choosing the right vegetation and the use of appropriate wildlife friendly planting to ensure maximum benefits to biodiversity as opposed to extensive use of sedum type green roofs which have limited biodiversity benefits.

In conclusion, we hope you will take our comments into consideration.

Yours faithfully

Martin Stride
Birmingham Friends of the Earth